

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES,
INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DECLARATION OF ROBERT C. GILL IN SUPPORT OF DEFENDANTS' BRIEF IN
OPPOSITION TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

1. I am an attorney at Saul, Ewing, Arnstein & Lehr LLP, counsel for Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "Castle Hill"). I was admitted *pro hac vice* in this matter on October 27, 2017.

2. Attached as **Exhibit 1** is a true and correct copy of excerpts from the 30(b)(6) Deposition of Josh Davis dated August 3, 2018.

3. Attached as **Exhibit 2** is a true and correct copy of excerpts from Plaintiffs' Sixth Supplemental Objections and Responses to Castle Hill's First Set of Interrogatories.

4. Attached as **Exhibit 3** is a true and correct copy of excerpts from the Deposition of Butch McGill dated May 10, 2018.

5. Attached as **Exhibit 4** is a true and correct copy of excerpts from the Deposition of James Starr dated May 23, 2018.

6. Attached as **Exhibit 5** is a true and correct copy of a document produced by VGT bearing Bates numbers VGT0064978-VGT0064986.

7. Attached as **Exhibit 6** is a true and correct copy of a document produced by VGT bearing Bates numbers VGT0065023-VGT0065037.

8. Attached as **Exhibit 7** is a true and correct copy of a document produced by VGT bearing Bates numbers VGT0065467-VGT0065481.

9. Attached as **Exhibit 8** is a true and correct copy of excerpts from the Deposition of Richard Williamson dated June 14, 2018.

10. Attached as **Exhibit 9** is a true and correct copy of excerpts from the 30(b)(6) Deposition of Alan Roireau dated August 1, 2018.

11. Attached as **Exhibit 10** is a true and correct copy of excerpts from the Deposition of Paul Suggs dated June 8, 2018.

12. Attached as **Exhibit 11** is a true and correct copy of excerpts from the Deposition of Stacy Friedman dated September 24, 2018.

13. Attached as **Exhibit 12** is a true and correct copy of excerpts from the Deposition of Robert Zeidman dated September 28, 2018.

14. Attached as **Exhibit 13** is a true and correct copy of Exhibit D to the Rebuttal of Stacy Friedman by Robert Zeidman dated August 31, 2018.

15. Attached as **Exhibit 14** is a true and correct copy of Exhibit E to the Rebuttal of Stacy Friedman by Robert Zeidman dated August 31, 2018.

16. Attached as **Exhibit 15** is a true and correct copy of Exhibit F to the Rebuttal of Stacy Friedman by Robert Zeidman dated August 31, 2018.

17. Attached as **Exhibit 16** is a true and correct copy of Exhibit G to the Rebuttal of Stacy Friedman by Robert Zeidman dated August 31, 2018.

18. Attached as **Exhibit 17** is a true and correct copy of Exhibit H to the Rebuttal of Stacy Friedman by Robert Zeidman dated August 31, 2018.

19. Attached as **Exhibit 18** is a true and correct copy of Gaming System With Individualized Centrally Generated Random Number Generator Seeds, U.S. Patent No. 6,533,664.

20. Attached as **Exhibit 19** is a true and correct copy of Gaming System and Process for Generating Card Faces, U.S. Patent No. 5,588,913.

21. Attached as **Exhibit 20** is a true and correct copy of Method and System for Storing Preselected Numbers for Use in Games of Bingo, U.S. Patent No. 6,656,045.

22. Attached as **Exhibit 21** is a true and correct copy of U.S. Patent Application No. 2005/0059469.

23. Attached as **Exhibit 22** is a true and correct copy of excerpts from the Deposition of Andrew Scheiner dated April 19, 2018.

24. Attached as **Exhibit 23** is a true and correct copy of excerpts from the Deposition of Alan Roireau dated May 15, 2018.

25. Attached as **Exhibit 24** is a true and correct copy of a document produced by Castle Hill bearing Bates numbers CHG0087214-CHG0087215.

26. Attached as **Exhibit 25** is a true and correct copy of a document produced by Castle Hill bearing Bates numbers CHG0089313-CHG0089314.

27. Attached as **Exhibit 26** is a true and correct copy of a document produced by VGT and introduced at the deposition of Richard Williamson as Williamson Dep. Ex. 102.

28. Attached as **Exhibit 27** is a true and correct copy of a document produced by VGT and introduced at the deposition of Richard Williamson as Williamson Dep. Ex. 103.

29. Attached as **Exhibit 28** is a true and correct copy of a document produced by VGT and introduced at the 30(b)(6) deposition of Richard Williamson as Williamson 30(b)(6) Dep. Ex. 3.

30. Attached as **Exhibit 29** is a true and correct copy of excerpts from the 30(b)(6) Deposition of Richard Williamson dated October 2, 2018.

31. Attached as **Exhibit 30** is a true and correct copy of a PDF version of excerpts of a native document produced by VGT in discovery and introduced at the 30(b)(6) deposition of Richard Williamson as Williamson 30(b)(6) Dep. Ex. 7.

32. Attached as **Exhibit 31** is a true and correct copy of a document introduced at the 30(b)(6) deposition of Richard Williamson as Williamson 30(b)(6) Dep. Ex. 8.

33. Attached as **Exhibit 32** is a true and correct copy of excerpts from the Deposition of Ryan North dated April 26, 2018.

34. Attached as **Exhibit 33** is a true and correct copy of a document produced by VGT and introduced at the deposition of Ryan North as North Dep. Ex. 16.

35. Attached as **Exhibit 34** is a true and correct copy of excerpts from the Deposition of Sarah (Gozdecki) Carlson dated June 21, 2018.

36. Attached as **Exhibit 35** is a true and correct copy of excerpts from the Deposition of Karl Roelofs dated June 14, 2018.

37. Attached as **Exhibit 36** is a true and correct copy of excerpts from the Deposition of Jason Sprinkle dated May 18, 2018.

38. Attached as **Exhibit 37** is a true and correct copy of excerpts from the Deposition of Jay Seigny dated July 12, 2018.

39. Attached as **Exhibit 38** is a true and correct copy of a document produced by VGT and introduced at the deposition of Jay Seigny as Seigny Dep. Ex. 126.

40. Attached as **Exhibit 39** is a true and correct copy of excerpts from the Deposition of David Marsh dated May 2, 2018.

41. Attached as **Exhibit 40** is a true and correct copy of a document produced by Castle Hill and introduced at the deposition of Ryan North as North Dep. Ex. 27.

42. Attached as **Exhibit 41** is a true and correct copy of a document produced by Castle Hill and introduced at the deposition of Ryan North as North Dep. Ex. 30.

43. Attached as **Exhibit 42** is a true and correct copy of a document produced by Castle Hill and introduced at the deposition of Ryan North as North Dep. Ex. 34.

44. Attached as **Exhibit 43** is a true and correct copy of excerpts from the Deposition of John Yarbrough dated July 11, 2018.

45. Attached as **Exhibit 44** is a true and correct copy of a document produced by VGT and introduced at the deposition of Ryan North as North Dep. Ex. 10.

46. Attached as **Exhibit 45** is a true and correct copy of excerpts from the Deposition of Will Harvie dated June 14, 2018.

47. Attached as **Exhibit 46** is a true and correct copy of excerpts from the Deposition of Larry Graham dated May 15, 2018.

48. Attached as **Exhibit 47** is a true and correct copy of a document produced by Castle Hill and introduced at the deposition of Ryan North as North Dep. Ex. 17.

49. Attached as **Exhibit 48** is a true and correct copy of a document produced by VGT and introduced at the deposition of Karl Roelofs as Roelofs Dep. Ex. 99.

50. Attached as **Exhibit 49** is a true and correct copy of a document produced by VGT and introduced at the deposition of Will Harvie as Harvie Dep. Ex. 117.

51. Attached as **Exhibit 50** is a true and correct copy of excerpts from the Deposition of Rich Sisson dated April 17, 2018.

52. Attached as **Exhibit 51** is a true and correct copy of the Declaration of Daniel Fulton in Support of Defendants' Brief in Opposition to Plaintiff's Motion for Partial Summary Judgment dated November 16, 2018.

53. Attached as **Exhibit 52** is a true and correct copy of a document produced by VGT bearing Bates numbers VGT0006912-VGT0006915 and introduced at the deposition of Paul Suggs as Suggs Dep. Ex. 378.

54. I declare under penalty of perjury that the foregoing is true and correct.
Executed on November 16, 2018 in Washington, District of Columbia.

/s/ Robert C. Gill
Robert C. Gill

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of November, 2018, I caused an unredacted copy of the foregoing **DECLARATION OF ROBERT C. GILL IN SUPPORT OF DEFENDANTS' BRIEF IN OPPOSITION TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT** to be served on the following counsel for Plaintiff who have consented to email service, via email:

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